

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

GEORGE IVERSON, Individually,)
Plaintiff,) Civil Action #: 1:04-CV-12079 NG-JLA
v.)
BRAINTREE PROPERTY)
ASSOCIATES, LIMITED)
PARTNERSHIP, a Massachusetts)
Limited Partnership,)
Defendant.)

)

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE REPLY TO
DEFENDANT'S MEMORANDUM OF LAW IN OPPOSITION TO PLAINTIFF'S
APPLICATION FOR FEES**

____ COMES NOW the Plaintiff, GEORGE IVERSON, by and through his undersigned attorneys, and moves this Court pursuant to Local Rule 7.1(3) for leave to file a Reply to Defendant's Memorandum of Law in Opposition to Plaintiff's Application for Fees, and as grounds therefor states:

1. Defendant has filed a lengthy Memorandum contesting Plaintiff's Application for Fees, raising many factual and legal issues in conjunction with its opposition.
2. Plaintiff asserts that it would be beneficial for the Court if Plaintiff was able to specifically address the arguments raised by the Defendant in its Memorandum of Law in Opposition to Plaintiff's Application for Fees.
3. If the Court grants Plaintiff's request for leave to file a Reply, Plaintiff further hereby requests that the Court allow Plaintiff 15 days from the date of the Court's Order to file a Reply Brief.

4. The undersigned counsel certifies that he has contacted counsel for Defendant in regard to the foregoing Motion, and that said counsel has no objection to the subject Motion of the Plaintiffs.

WHEREFORE, it is respectfully requested that the Court grant Plaintiff leave to file a Reply to Defendant's Memorandum in Opposition to Defendant's Application for Fees, and allow Plaintiff 15 days from the dates of the Order to file said Reply.

Respectfully submitted,
FULLER, FULLER & ASSOCIATES, P.A.
Attorneys for Plaintiff

By: /s/John P. Fuller
John P. Fuller, Esq., *pro hac vice*
12000 Biscayne Boulevard, Suite 609
North Miami, FL 33181
jpf@fullerfuller.com
Tel.: (305) 891-5199
Fax: (305) 893-9505

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served electronically via the Court's CM/ECF System on December ___, 2007, to:

Jennifer Martin Foster, Esq.
Greenberg Traurig, LLP
One International Place
Boston, MA 02110
617-310-6000

and by email to:

Brian C. Blair, Esq.
Baker & Hostetler, LLP
200 South Orange Avenue #2300
Orlando, FL 32801
Bblair@bakerlaw.com

FULLER, FULLER & ASSOCIATES, P.A.
Attorneys for Plaintiff
12000 Biscayne Boulevard, Suite 609
North Miami, FL 33181
jpf@fullerfuller.com
Tel.: (305) 891-5199
Fax: (305) 893-9505

By: /s/ John P. Fuller
John P. Fuller, Esq., *pro hac vice*